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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

RAINBOW BUSINESS SOLUTIONS, ET
AL.

Plaintiffs,

v.

MERCHANT SERVICES, INC.; ET AL.,

Defendants.

Case No. CV 10-01993 CW

**JOINT STIPULATION TO RESET
DEADLINES FOR EXPERT
DISCLOSURE AND ~~PROPOSED~~
ORDER**

1 WHEREAS, pursuant to (i) the Stipulation dated February 15, 2013 [dkt. # 480] and the
 2 Order dated February 21, 2013 [dkt. # 481] (together, the “February 2013 Order”); and (ii) the
 3 Stipulation dated September 12, 2013 [dkt. # 548] and the Order dated September 13, 2013 [dkt.
 4 # 549] (together, the “September 2013 Order”) the deadlines for expert disclosure and/or reports
 5 is December 10, 2013; rebuttal disclosure and/or reports is January 21, 2014; the completion of
 6 fact and expert discovery is February 18, 2014 and the Dispositive Motion Hearing and Case
 7 Management Conference is March 14, 2014;

8 WHEREAS, after the Order was made, the parties began engaging in settlement
 9 discussions, and a settlement with some defendants was reached, causing the hearing on
 10 Plaintiffs’ Motion for Class Certification to be moved from March 7, 2013 to August 29, 2013;

11 WHEREAS, the court has not yet ruled on Plaintiffs’ Motion for Class Certification;

12 WHEREAS, in light of the foregoing and to afford the parties adequate time to prepare
 13 expert disclosure and reports relevant to any and all issues that may require expert opinion(s) and
 14 discovery thereon, the parties have agreed to extend the current schedule as follows:

- 15 • Expert disclosure and/or reports from December 10, 2013 to April 3, 2014
- 16 • Rebuttal disclosure and/or reports from January 21, 2014 to May 22, 2014
- 17 • Completion of fact and expert discovery from February 18, 2014 to June 26, 2014
- 18 • Case-Dispositive Motion Hearing and Case Management Conference from March
 19 14, 2014 to August 21, 2014.

20 WHEREAS five prior extensions with respect to deadlines set forth above have been
 21 made;

22 WHEREAS the Court has not yet set a trial date;

23 NOW, THEREFORE, IT IS STIPULATED, by and between the undersigned parties
 24 through their respective counsel of record, that the Court modify the February 2013 Order and
 25 September 2013 Order as follows:

- 26 • Expert disclosure and/or reports due by April 3, 2014;
- 27 • Rebuttal disclosure and/or reports due by May 22, 2014;
- 28 • Completion of fact and expert discovery by June 26, 2014; and

- Case-Dispositive Motion Hearing and Case Management Conference on August 21, 2014.

This schedule will not impact any other scheduled dates.

Date: December 4, 2013

Respectfully submitted,

GUTRIDE SAFIER LLP

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Northern Leasing Systems, Inc., and SKS
Associates, LLC

1 Pursuant to Local Civil Rule 6-2(a), and **GOOD CAUSE APPEARING THEREFOR**,
2 the parties' expert disclosure and/or reports shall be due by February 4, 2014; rebuttal disclosure
3 and/or reports shall be due by March 18, 2014; fact and expert discovery shall be completed by
4 April 15, 2014; and Case-Dispositive Motion Hearing and Case Management Conference on
5 August 14, 2014.

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7 **IT IS SO ORDERED.**

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9 DATED: 12/5/2013


10 THE HONORABLE CLAUDIA WILKEN
11 UNITED STATES DISTRICT JUDGE
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